



December 1, 2014

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Subject: Comments on Draft Waste Discharge Requirements for Growers in the  
Grassland Drainage Area (Groundwater Order)

Dear Pamela:

Enclosed are comments on behalf of the Grassland Basin Drainers on the draft Waste Discharge Requirements. In general, there are conclusions in many places in the document that may be based on some general statement or piece of information provided by the Grassland Basin Drainers but that are applied in a manner that it is not entirely accurate. We look forward to the opportunity to work with Staff prior to release of the final draft to clarify these areas. Our specific comments follow:

WDR Finding 3, page 2. The next to last sentence states: "The Grassland Drainage Area water districts prohibit tailwater return flows into district-owned canals." The statement also appears in various wording in the Information Sheet and Attachment D. It is true that tailwater is not discharged into the Grassland Bypass channel but this is a complex issue that needs more time to clarify. We would appreciate the opportunity to further discuss this issue.

WDR Finding 4, page 3. To clarify the last sentence, item 2). There are three streams from the current pilot plant, one is a reject water stream, the second is a treated water stream and the third is a bypass (untreated) water stream. Mixed together they comply with 2) but not individually. Suggest it be reworded to: "2) the concentration of the combined effluent is not greater than the influent."

WDR Finding 5, page 3. The sentence that reads "The GBD Steering Committee is a separate entity with a board of directors which prepares a budget, and may enter into contractual agreements" is not entirely accurate. It is requested the sentence be changed to: "The Activity Agreement is directed by a Steering Committee comprised of representatives of the Activity Agreement Member Agencies. The GBD Steering Committee sets the budget for the activity for approval by the Water Authority Board and authorizes contracts within that budget. Both Member Agencies and Individual

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Members under this Order participate by joining a special project of the Activity Agreement.”

WDR Finding 6, page 3. We suggest that “privately and publicly managed wetlands excluding the non-irrigated upland habitat associated with managed wetlands” be added to the “irrigated lands” definition, similar to what is in the Westside Coalition general order. There is the possibility of these lands occurring within the boundary of this order.

WDR, VII.B. page 23. The initial FEP is due by all members 1 March 2016. The GAR is due approximately in July 2016. High vulnerable areas will not be identified by 1 March, 2016. We request that the first FEP be delayed until 1 March 2017 after the GAR so that we can properly target just high vulnerable areas. The FEP summaries are due in the annual reports due 30 April. There will not be adequate time between 1 March 2017 and 30 April 2017 to enter and compile the FEP data. Therefore the first annual report summarizing 1 March 2017 FEP data should be 30 April 2018 with subsequent reports following the same timetable. There would be a corresponding delay in the reporting for low vulnerability areas.

WDR, VII C. page 24. Paragraph 1.a. indicates all members in a high vulnerability area prepare a NMP by 15 April, 2016. This is prior to the GAR being completed in approximately July 2016, therefore high vulnerability will not yet have been determined. We request preparation of the first NMP be delayed until 15 April 2017 and the first NMP Summary Report be submitted by 15 April 2018. There would be a corresponding delay in the reporting for low vulnerability areas.

WDR, VIII.B. page 26. We request that the phrase “groundwater related” be added before Farm Evaluation. This will clarify that items dealing with surface water, which will be covered under a separate order, are not required under this groundwater order.

WDR, VIII.H. page 29. We request that 180 days from GAR approval be allowed to provide a Basin Plan Amendment Workplan. It is likely that such a response will be needed in the Grassland Drainage Area to manage salinity and the additional time will be critical to the long term planning.

WDR, Figure 1. page 32. The boundary needs to be clarified. A GIS file will be provided by December 8 indicating the correct specific boundary.

Information sheet, map, page 7. The map is incorrect and a revised map will be provided by December 8.

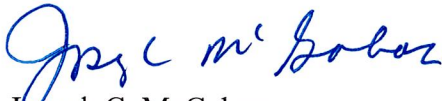
Information sheet, map, page 10. The map does not show the full SJRIP. A revised map will be provided by December 8.

MRP, Table 1, page 11. We request that dissolved oxygen be removed from the table for the groundwater Trend Monitoring wells. Dissolved should not be a constituent of concern in groundwater.

Attachment D. This entire attachment has significant changes directly added related to the Grassland Drainage Area. We request that we have further discussions to understand these revisions. For example, in the section "Potential Impacts identified in the PEIR not applicable to the Order", page 4. The last full paragraph starting with "Since this Order is specific to groundwater..." needs some clarification to specify what actions are not applicable because this is a groundwater order. For example any policy regarding the construction of tailwater ponds has occurred for many reasons including as conservation measures to conserve water.

Thank you for the opportunity to comment, and we look forward to working with the Board in finalizing and implementing this draft Order.

Very truly yours,



Joseph C. McGahan  
Drainage Coordinator  
Grassland Basin Drainers